REMARKS

- 1. The Examiner has indicated that the title is not descriptive and has required a new title. The Applicant has amended the title and respectfully submits that the new title is now more indicative of the invention to which the clams are directed.
- 2. The Examiner has objected to claims 2 and 8. The Applicant has amended claims 2 and 8 to correct the informalities indicated by the Examiner. Accordingly, the Applicant respectfully requests that the Examiner withdraw their objection to claims 2 and 8.
- 3. The Examiner has rejected claims 13-15 under 35 U.S.C. §112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicant regards as the invention. It is the Applicant's understanding that the Examiner has rejected claim 13 as being vague and indefinite for referring to functions performed by the processor in the body of the claim. The Applicant has amended claim 13 to remove references to functions performed by the processor and now respectfully submits that claims 13-15 now more particularly point out and distinctly claims the subject matter which the Applicant regards as the invention. Accordingly, the Applicant respectfully requests that the Examiner withdraw their 35 U.S.C. §112, second paragraph rejection of claims 13-15.
- 4. The Examiner has rejected claims 1-15 under 35 U.S.C. §101 as being directed to non-statutory subject matter. It is the Applicant's understanding that the Examiner has taken the position that the claims cite a method where no physical change occurs

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and where "the method merely manipulates abstract ideas or solves a purely

mathematical problem without any limitation to a practical application." The Applicant

has amended claims 1 and 13 to clearly point out and distinctly claim a practical

application of the invention for a system capable of operating on and displaying

arrangements of line segments in a plane, wherein a partition data structure

representing the arrangement of line segments in a plane is created. So the Applicant

respectfully submits that the practical application is to create the necessary data

structure for use by they system in the course of operating and displaying arrangements

of line segments in a plane. Accordingly, the Applicant respectfully requests that the

Examiner withdraw their 35 U.S.C. §101 rejection of claims 1-15.

CONCLUSION

The Applicant respectfully submits that the foregoing amendments and

arguments overcome the Examiner's various objections and 35 U.S.C. §101 and 35

U.S.C. §112, second paragraph rejections and respectfully submits that claims 1-15 are

now in a condition for allowance.

If it would facilitate the furtherance of this matter, the Examiner is encouraged to

call the undersigned at (650) 812-4269.

Respectfully submitted,

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Amendment